

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

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NOVOSHIP (UK) LIMITED, CALLY	:	07 Civ. 9876 (DLC)
SHIPHOLDINGS, INC., VITAL SHIPPING	:	
CORPORATIONS, and DAINFORD	:	
NAVIGATION INC.,	:	<u>NOTICE OF MOTION</u>
	:	
Plaintiffs,	:	
	:	
v.	:	
	:	
WILMER RUPERTI, SEA PIONEER SHIPPING	:	
CORPORATION, and PMI TRADING, INC.,	:	
JOHN DOE (fictitious) and JOHN DOE INC.	:	
(fictitious),	:	
	:	
Defendants.	:	
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PLEASE TAKE NOTICE that, upon the accompanying memorandum of law, and all the prior proceedings in this matter, Defendants Wilmer Ruperti, Sea Pioneer Shipping Corporation and PMI Trading, Inc. will move this Court before the Honorable Denise L. Cote, United States District Judge, at a date and time to be set by the Court, at the United States Courthouse, 500 Pearl Street, New York, New York 10007, for an order to vacate the *ex parte* order for process of maritime attachment and garnishment entered on November 7, 2007, to preclude further maritime attachments and to dismiss this action with prejudice for lack of jurisdiction, and for such other and further relief as the Court may deem just and proper.

Dated: December 7, 2007

Respectfully submitted,

STROOCK & STROOCK & LAVAN, LLP

By: James L. Bernard /s/

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